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July 3, 2019

*Via E-mail*

Andrea Leshak, Esq.  
Office of Regional Counsel  
U.S. Environmental Protection Agency,  
Region 2  
290 Broadway, 17th Floor  
New York, New York 10007-1866

Re: PROTECO Site in Puerto Rico

Dear Ms. Leshak:

This is a supplemental response made on behalf of Block Drug Company, Inc. ("BDC") to the United States Environmental Protection Agency's ("EPA's") March 28, 2019 Request for Information addressed to Jack Bailey with respect to the above-referenced site (the "RFI"). BDC's initial response was submitted on May 3, 2019.

This response is based upon BDC and GSK's continued search for documents and information in their possession relating to Reedco, including the former Reedco facility located at or about State Road No. 3, Km. 76.4, Rio Abajo Ward, in Humacao, Puerto Rico (the "Facility"), which is the subject of the RFI, and to the PROTECO Site. It provides title information recently received by BDC.

BDC reserves its right to continue to review and to supplement, modify, and/or amend its responses should additional information become available.

### **BDC's Response to EPA's Request for Information**

BDC objects to the instructions provided with the RFI, the definitions, and the requests to the extent any of those exceed the authority given to EPA in 42 U.S.C. § 9604.

Subject to these objections, BDC responds as follows with respect to the Facility:

2. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e). Without waiving such objection, Reedco, Inc. was incorporated in Delaware under the name Tegrin, Inc. (“Tegrin”). The name of the corporation was changed to Pegrel, Inc. on July 25, 1974 and to Reedco, Inc. on August 23, 1974. Reedco was merged into BDC in or about 2008.

6. Tegrin began operations at the Facility in March 1974. Tegrin acquired the initial Facility parcel on February 2, 1973. That parcel is Property Number 8747 recorded at Page 11 of Volume 240 of Humacao (enclosed, report dated 5/17/19). This parcel is owned today by RTG Properties (PR), Inc. Reedco acquired a second parcel on April 3, 1995. That property is Property Number 21,437-A recorded at Page 54 of Volume 473 of Humacao (enclosed, report dated 5/9/19). It is today owned by Allied Properties, Inc. Reedco acquired a third parcel on May 29, 1997. That parcel is Property Number 13,327 recorded at Page 35 of Volume 322 of Humacao (enclosed, report dated 5/9/19). It is currently owned by FP Properties, Inc. The Facility, including those three parcels, was sold in or about 2004 to F.I.G., Inc. pursuant to the previously supplied November 11, 2004 Asset Purchase Agreement.

8. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e). Without waiving such objection, Tegrin initially produced personal care products such as Tegrin shampoos, skin cream, and medicated lotion. Reedco began manufacturing Kwell shampoo, cream, and lotion, all of which contained Lindane, in November 1974. Manufacturing of Kwell ended in 1992. The manufacturing processes for those products are described in the attachment to Reedco’s March 31, 1987 Application for Tax Exemption, attached.

20. Reedco’s use of hazardous substances and its waste streams at the Facility are described in Reedco’s May 7, 1993 response to EPA’s April 2, 1993 Request for Information, both attached. Also attached is Reedco’s March 4, 1997 response to EPA’s February 5, 1997 Request for Information, both attached.

21. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e). Without waiving such objection, see response to Request No. 20.

22. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e). Without waiving such objection, Reedco’s handling, storage and disposal practices at the Facility are described in Reedco’s March, 1997 Hazardous Waste Preparedness Prevention and Contingency Plan with Emergency Procedures, and in the May, 1990 EQB RCRA Facility Assessment Report, both attached.

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24. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e). Without waiving such objection, see waste manifests, correspondence, and related documents (including duplicates) with respect to the Facility and either Servicios Carbareon, Inc. ("SCI") or Protección Técnica Ecológica Corp. ("PTEC"). Note that the PTEC documents (Bates Nos. 298-313) state that the wastes were disposed of in the continental United States despite the waste manifests showing the designated disposal facility as Protecto in Puerto Rico. Bates Nos. 314-361 appear to be a complete set of manifests that reflect the transportation of approximately 38,500 gallons of shampoo wastewater and 9,998 pounds of contaminated gloves, etc. by SCI. The remaining manifests and related correspondence appear to be duplicates or otherwise reference the manifests in that set.

25. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e).

26. See response to Request No. 24.

27. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e).

29. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e). Without waiving such objection, a list of employees most knowledgeable about the Facility's waste management practices from 1975 to 1982 is included in Reedco's May 7, 1993 response to EPA's April 2, 1993 Request for Information.

Very truly yours,



Glenn A. Harris

GAH/mds

cc: Zolyamar Luna